

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**WILBERT COOLEY and
KANDEE COOLEY,**

Plaintiffs

v.

**AMERIQUEST MORTGAGE
COMPANY, a Delaware
Corporation; HERITAGE
TITLE, LLC, et al.,**

Defendants

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Case No. 1:06-cv-00215-BH-M

**MOTION OF DEFENDANT HERITAGE TITLE, LLC FOR
ENLARGEMENT OF TIME IN WHICH TO RESPOND TO COMPLAINT**

COMES NOW the Defendant, Heritage Title, LLC, and respectfully moves the Court for an extension of time in which to move, answer or otherwise respond to the Complaint and, as grounds, aver as follows:

1. This Defendant was served with the Complaint in this action on or about June 12, 2006. Defendant's initial response to the Complaint will be due on or before July 5, 2006.

2. The undersigned counsel has just recently been retained to represent Heritage Title in this case and has not completed his investigation into the matters made the basis of this action. The undersigned requests additional time within which

to complete his initial investigation and prepare an appropriate response to the Complaint.

3. Defendant requests an extension of ten days within which to answer, move or otherwise respond to the Complaint so that the initial response shall be due on or before July 17, 2006.

4. The undersigned counsel has contacted Plaintiffs' attorney and Plaintiffs' attorney has advised that she has no objection to this requested extension.

WHEREFORE, the Defendant, Heritage Title, LLC, requests that this Court grant the Defendant an extension of time to move, answer or otherwise respond to the Complaint as requested herein.

s/Robert A. Huffaker
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Bar Number: ASB-7668-U79R

Attorney for Defendant
Heritage Title, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

April England Albright
The Justice Group, Inc.
116 Mabry Street
Selma, Alabama 36701

Kaye K. Houser
Robin L. Beardsley
Sirote & Permutt, P.C.
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s/Robert A. Huffaker
Of Counsel